

COLIN L. COOPER, SBN 144291
 KELLIN R. COOPER, SBN 172111
 THE COOPER LAW OFFICES
 800 Jones Street
 Berkeley, CA 94710
 Telephone (510) 558-8400
 Facsimile (510) 558-8401
 www.cooperdefense.com

Attorneys for Defendant
 IAN BENJAMIN ROGERS

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	Case No. 21-CR-00274-CRB
)	
Plaintiff,)	JOINT STIPULATION AND [PROPOSED]
)	ORDER TO CONTINUE STATUS
vs.)	CONFERENCE TO FEBRUARY 2, 2022
)	
IAN BENJAMIN ROGERS and)	
JARROD COPELAND,)	
)	
Defendants.)	

On July 8, 2021, the grand jury issued a six-count indictment charging IAN ROGERS and JARROD COPELAND with conspiring to destroy a building by arson or explosive devices, weapons violations and obstruction of justice. Mr. ROGERS has been (and remains) in custody in Napa County facing weapons charges since January, 2021. The parties made their first appearance in District Court on August 18, 2021. Mr. ROGERS appeared pursuant to a writ issued February 18, 2021. At that time, the parties agreed to continue the matter for a status conference to October 27, 2021. On October 27, 2021, the parties agreed to continue the matter for another status conference to December 14, 2021. Since then, the government has provided additional discovery. In addition, Mr. ROGERS' attorney, Colin Cooper, has been assigned out

1 and is in trial in a homicide case in state court in Contra Costa County. The trial is expected to
2 last until the end of January, 2022.

3 The parties hereby request that the Court continue the status conference from December
4 14, 2021 to February 2, 2022 at 10:00 a.m. The continuance will allow the government the time
5 needed to produce additional discovery and enable all parties to be in a better position to discuss
6 both the pending charges and potential resolution. A continuance will also allow the government
7 time to conduct a reverse proffer with defense counsel and defendants (scheduled for January 12,
8 2022). This reverse proffer will also enable all parties to be in a better position to discuss both
9 the pending charges and potential resolution.
10

11 For these reasons, and to allow for the effective preparation of counsel, the parties agree
12 that the ends of justice served by excluding the time from December 14, 2021 through February
13 2, 2022 from computation under the Speedy Trial Act outweigh the best interests of the public
14 and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A) AND (h)(7)(B)(iv).

15 IT IS SO STIPULATED.

16 Respectfully submitted,

17 THE COOPER LAW OFFICES

18 Dated: December 8, 2021

19 _____/s/_____
COLIN COOPER
Attorney for IAN ROGERS

20
21 Dated: December 8, 2021

22 _____/s/_____
FRANK RIEBLI
ASSISTANT UNITED STATES ATTORNEY

23
24 Dated: December 8, 2021

25 _____/s/_____
JOHN AMBROSIO
Attorney for JARROD COPELAND

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	Case No. 21-CR-00274-CRB
)	
Plaintiff,)	
)	[PROPOSED] ORDER
vs.)	
)	
IAN BENJAMIN ROGERS and)	
JARROD COPELAND,)	
)	
Defendants.)	

For the reasons set forth above, the Court hereby continues the status conference in the above-captioned matter from December 14, 2021 until February 2, 2022 at 10:00 a.m. Further, to allow for the continued production of discovery and the effective preparation of counsel, the Court finds that the ends of justice served by granting the continuance outweigh the interests of the public and the defendants, and thus the Court excludes that period of time from the running of the speedy trial clock under Rule 5.1 and 18. U.S.C. § 3161(b). The Court further orders that, to the extent that IAN ROGERS remains in state custody, the U.S. Marshal and the Director of Corrections of the Napa County Department of Corrections shall produce Ian Rogers for the hearing on February 2, 2022, as provided in the writ issued on February 18, 2021 in this matter.

IT IS SO ORDERED.

DATED: _____

HON. CHARLES R. BREYER
UNITED STATES DISTRICT COURT